The Facebook, Inc. v. Connectu, LLC et al

**EXHIBIT QQ** 

Doc. 127 Att. 38

1 Scott R. Mosko (State Bar No. 106070) FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, L.L.P. Stanford Research Park 700 Hansen Way 3 Palo Alto, California 94304 Telephone: 4 (650) 849-6600 (650) 849-6666 Facsimile: 5 6 Attorneys for Defendants Connectu LLC, Cameron Winklevoss, Tyler Winklevoss, Howard Winklevoss, 7 and Divya Narendra 8 9 SUPERIOR COURT OF THE STATE OF CALIFORNIA 10 COUNTY OF SANTA CLARA 11 12 CASE NO. 105 CV 047381 THE FACEBOOK, INC. 13 Plaintiff, RESPONSE OF DEFENDANT 14 CAMERON WINKLEVOSS TO FIRST SET OF REQUESTS FOR ADMISSION 15 v. CONNECTU LLC, CAMERON WINKLEVOSS, 16 TYLER WINKLEVOSS, HOWARD WINKLEVOSS, DIVYA NARENDRA, AND 17 DOES 1-25. 18 Defendants. 19 20 21 22 23 24 25 26 27 28 RESPONSE OF DEFENDANT CAMERON WINKLEVOSS TO

FIRST SET OF REQUESTS FOR ADMISSION

Doc, No. 430397

1	PROPOUNDING PARTY:	Plaintiff THEFACEBOOK, INC.
2	RESPONDING PARTY:	Defendant CAMERON WINKLEVOSS
3	SET NO.:	ONE (1)
4	TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:	
5	The above-named party hereby responds, pursuant to California Code of Civil Procedure	
6	Section 2033, to the requests for admission as follows:	
7	RESPONSE TO REQUESTS FOR ADMISSIONS	
8	RESPONSE TO REQUEST NO. 1:	
9	This Request is Denied.	
10	RESPONSE TO REQUEST NO. 2:	
11	Responding party admits visiting FACEBOOK's website but only in his capacity as a	
12	member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to	
13	Request No. 2.	
14	RESPONSE TO REQUEST NO. 3:	
15	Responding party admits visiting FACEBOOK's website but only in his capacity as a	
16	member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to	
17	Request No. 3.	
18	RESPONSE TO REQUEST NO. 4:	
19	Responding party admits vis	iting FACEBOOK's website but only in his capacity as a
20	member of ConnectU. Regarding the	ne remainder of the Request, see ConnectU's Response to
21	Request No. 4.	
22	RESPONSE TO REQUEST NO. 5:	
23	Responding party admits vis	siting FACEBOOK's website but only in his capacity as a
24	member of ConnectU. Regarding the	ne remainder of the Request, see ConnectU's Response to
25	Request No. 5.	
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## RESPONSE TO REQUEST NO. 6: 1 Responding party admits visiting FACEBOOK's website but only in his capacity as a 2 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to 3 Request No. 6. 4 RESPONSE TO REQUEST NO. 7: 5 Responding party admits visiting FACEBOOK's website but only in his capacity as a 6 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to 7 8 Request No. 7. **RESPONSE TO REQUEST NO. 8:** 9 Responding party admits visiting FACEBOOK's website but only in his capacity as a 10 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to 11 12 Request No. 8. **RESPONSE TO REQUEST NO. 9:** 13 This Request is Denied. 14 **RESPONSE TO REQUEST NO. 10:** 15 16 This Request is Denied. RESPONSE TO REQUEST NO. 11: 17 18 This Request is Denied. RESPONSE TO REQUEST NO. 12: 19 20 This Request is Denied. 2.1 **RESPONSE TO REQUEST NO. 13:** This Request is Denied. 22 23 **RESPONSE TO REQUEST NO. 14:** This Request is Denied. 24 25 RESPONSE TO REQUEST NO. 15: Responding party admits visiting FACEBOOK's website but only in his capacity as a 26 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to

Request No. 15.

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# RESPONSE TO REQUEST NO. 16:

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Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 16.

#### RESPONSE TO REQUEST NO. 17:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 17.

## **RESPONSE TO REQUEST NO. 18:**

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 18.

#### RESPONSE TO REQUEST NO. 19:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 19.

## **RESPONSE TO REQUEST NO. 20:**

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 20.

#### **RESPONSE TO REQUEST NO. 21:**

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 21.

## **RESPONSE TO REQUEST NO. 22:**

This Request is Denied.

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# **RESPONSE TO REQUEST NO. 23:**

This Request is Denied.

# **RESPONSE TO REQUEST NO. 24:**

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 24.

# **RESPONSE TO REQUEST NO. 25:**

This Request is Denied.

RESPONSE OF DEFENDANT CAMERON WINKLEVOSS TO FIRST SET OF REQUESTS FOR ADMISSION

CAMERON WINKLEVOSS, under penalty of perjury under the laws of the State of California, states as follows:

- That he is one of the Defendants in the above-entitled action;
- 2. That he has read the foregoing RESPONSE OF DEFENDANT CAMERON WINKLEVOSS TO FIRST SET OF REQUESTS FOR ADMISSIONS and knows the contents thereof, and that the same is true of his own knowledge, save and except as to the matters which are therein stated on his information or belief, and as to those matters, he believes it to be true.

Executed on the 30 day of October, 2005, at 7:25 PM

Cameron Winklevoss